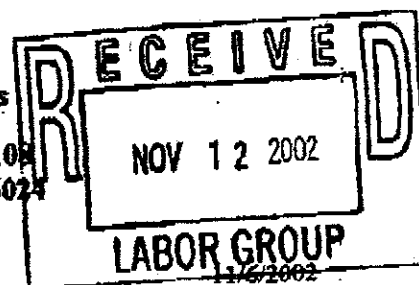


FROM VERIZON AA/EO&DIV. COMP.

(TUE) 11. 12' 02 16:48/ST. 16:46/NO. 4860859861 P 3

The Commonwealth of Massachusetts
 Commission Against Discrimination
 One Ashburton Place, Boston, MA 02108
 Phone: (617) 994-6000 Fax: (617) 994-6024



Verizon
 John May, Esquire
 1095 Avenue of the Americas
 New York, NY 10036

RE: Eric Sheehan vs. Verizon
 MCAD Docket Number: 02BEM03724
 EEO/CHUD Number: 16CA300296

Dear Respondent:

Please be advised that the Massachusetts Commission Against Discrimination (MCAD) has received the above referenced complaint of discrimination which alleges that you have committed an act of discrimination. A copy of that complaint is enclosed.

State law requires the Commission to impartially review the allegations in that complaint. The Commission has assigned one of its staff, Jeannine Rice, to investigate the complaint. This MCAD investigator will keep the parties informed of developments arising from that investigation.

State law requires that you submit a formal written answer to the complaint in the form of a Position Statement. This written answer should be submitted to MCAD Investigator within twenty-one (21) days of receipt of this notification. In addition, the Position Statement must be notarized. A copy must also be forwarded to the Complainant at the address listed on the enclosed complaint. Failure to file an answer or Motion for a More Definite Statement within the prescribe time may result in sanctions being imposed in accordance with 804 CMR 1.16. These sanctions may include but are not limited to:

- a. allegations in the complaint being taken as established for the purposes of the case in accordance with the claims of the Complainant;
- b. a waiver by Respondent of the right to have the Commission conduct further investigation, determine whether there is probable cause and/or make conciliation efforts;
- c. your being barred from introducing any and all evidence at the public hearing;
- d. your being barred from introducing designated matters into evidence at the public hearing;
- e. your being barred from presenting any and all defenses at the public hearing; and,
- f. your being barred from opposing designated claims or supporting designated defenses at the public hearing.

Please note that you must include in the Position Statement one of the following statements:

I am (or Respondent is) represented by an attorney in this matter.

-OR-

I am (or Respondent is) not represented by an attorney in this matter.

Failure to submit an accurate statement may result in adverse action being taken against you as the Respondent. Please note that if your representational situation changes, you must notify the Commission immediately.

In order to reduce the time necessary to investigate and resolve complaints of discrimination, the MCAD schedules an Investigative Conference with the parties shortly after the complaint is filed. Information about that Conference is included with this notice.

MCAD Docket Number 02BEM03724, Serve Respondent - With Investigative Conference

FROM VERIZON AA/EEO&DIV. COMP.

(TUE) 11. 12' 02 16:48/ST. 16:46/NO. 4860859861 P 4

~~An Investigative Conference regarding the above complaint will be held at the Commission's Offices, One Ashburton Place, Boston, MA, at 10:30 AM on 02/11/03. You are required to attend this Conference.~~

One important purpose of this Conference will be to determine whether the parties are willing to consider a rapid, informal and voluntary resolution of this dispute. The Commission encourages such resolutions as an alternative to the often lengthy and expensive litigation process.

If you have any questions pertaining to the Investigative Conference, please contact Jeannine Rice at (617) 994-6091.

Sincerely,

Jeannine Rice
Investigator

Cc:

EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

Verizon
Chief Executive Officer
185 Franklin Street
Boston, MA 02110

Person Filing Charge: Eric Sheehan
This Person (Check One): ☐ Claims to be aggrieved
☐ Is filing on behalf of
Date of Alleged Violation: 10/23/02
Place of Alleged Violation: Boston, Office
EEOC Charge Number: 16CA300296
MCAD Docket Number: 02BEM03724

NOTICE OF CHARGE OF DISCRIMINATION WHERE AN FEP AGENCY WILL INITIALLY PROCESS (See Attached Information Sheet For Additional Information)

You are hereby notified that a charge of employment discrimination under

- ☐ Title VII of the Civil Rights Act of 1964
☐ The Age Discrimination in Employment Act of 1967 (ADEA)
☐ The Americans Disabilities Act (ADA)

Has been received by

- ☐ The EEOC and sent for initial processing to MCAD
(FEP Agency)

- ☐ The Mass. Commission Against Discrimination
(FEP) Agency and sent to the EEOC for dual filing purposes.

While the EEOC has jurisdiction (upon the expiration of any deferral requirements if this is a Title VII or ADA Charge) to investigate this charge, EEOC may refrain from beginning an investigation and await the issuance of the Agency's final findings and orders. These final findings and orders will be given weight by EEOC in making its own determination as to whether or not reasonable cause exists to believe that the allegations made in the charge are true.

You are therefore encouraged to cooperate fully with the Agency. All facts and evidence provided by you to the Agency in the course of its proceedings will be considered by the Commission when it reviews the Agency's final findings and orders. In many instances the Commission will take no further action, thereby avoiding the necessity of an investigation by both the Agency and the Commission. This likelihood is increased by your active cooperation with the Agency.

- ☒ As a party to the charge, you may request that EEOC review the final decision and order of the above named Agency. For such a request to be honored, you must notify the Commission in writing within 15 days of your receipt of the Agency's issuing a final finding and order. If the agency terminates its proceedings without issuing a final finding and order, you will be contacted further by the Commission. Regardless of whether the Agency or the Commission processes the charge, the Recordkeeping and Non-Retaliation provisions of Title VII and the ADEA as explained on the second page of this form apply.

For further correspondence on this matter, please use the charge number(s) shown.

- ☐ An Equal Pay Act Investigation (29 U.S.C. 206(d)) will be conducted by the Commission concurrently with the Agency's investigation of the charge.

- ☒ Enclosure: Copy of the Charge

Basis of Discrimination

- ☐ Race ☐ Color ☐ Sex ☐ Religion ☐ National Origin
☐ Age ☐ Disability ☐ Retaliation ☐ Other

Circumstances of alleged violation:

SEE ENCLOSED COPY OF THE CHARGE OF DISCRIMINATION (or EEOC FORM 5)

Date	Type Name/Title of Authorized EEOC Official	Signature
11/6/2002	Robert L. Sanders, Director	

**The Commonwealth of Massachusetts
Commission Against Discrimination
One Ashburton Place, Boston, MA 02108
Phone: (617) 994-6000 Fax: (617) 994-6024**

MCAD DOCKET NUMBER: 02BEM03724
FILING DATE: 11/06/02

EEOC/HUD CHARGE NUMBER: 16CA300296
VIOLATION DATE: 10/23/02

Name of Aggrieved Person or Organization:

Eric Sheehan
250 Reservoir Ave
Revere, MA 02151
Primary Phone: (781)284-8643 ext. _____

Named is the employer, labor organization, employment agency, or state/local government agency who discriminated against me:

Verizon
John May, Esquire
Legal Department
1095 Avenue of the Americas
New York New York 10036

No. of Employees: 25+
Work Location: office

Cause of Discrimination based on:
Sex, Male.

The particulars are:

I, Eric Sheehan, the Complainant believe that I was discriminated against by Verizon, on the basis of Sex. This is in violation of M.G.L. 151B Section 4 Paragraph 1 and Title VII.

I began working for the Respondent in May 1996, as an engineer. On April 1, 2001, I was promoted to a 2M manager, under the supervision of Linda Richelson. From that date and continuing until I was forced out of the department on December 21, 2001, I was harassed by Linda because of my sex. I was subjected to her setting me up to fail, such as giving me assignments at the very last minute with no time to complete. Withholding important information from me so I could not do my job effectively, and giving me a very low rating on my evaluation with no raise. I complained several time to the human resources, the VP and the President, but nothing was done. On or about December 21, 2001 I was assaulted by Linda and refused to work with her, at that time the matter went to the EEO Compliance Group to investigate. HR then offered me the same position working for a different director. I agreed to take it and found that it was a 2L, which is lower in status and does not have any staff. Additionally it was in the same dept., and I reported to a different director who was under the same VP who was close friends with Linda. Out of fear of retaliation, I was forced to take another demotion and move to another department.

In February 2002, I learned that Linda have given me a low evaluation with no raise and a 3% VIP Award. When I spoke with HR they indicated that if she were found to violated company practices then they would review the evaluation she wrote. In June I learned that the investigation was completed and it was found that Linda violated company practices. I then spoke with HR to correct my evaluation, as it was false, return me to my M2 level, and give me the raise and VIP Award I was entitled to. To date, HR continues to put me off on this matter.

FROM VERIZON AA/EEO&DIV. COMP.

(TUE) 11. 12' 02 15:49/S7. 16:46/NO. 4860859861 P 7

I believe I have been discriminated against because of my gender in that Linda often made comments that I reminded her of ex-husband; set me up on many occasions to fail; harassed me, wrote a false evaluation on me, and denied me my rightful raise. The Respondent found her guilty of said crimes but to date, refuses to correct my situation.

I swear or affirm that I have read this complaint and that it is true to the best of my knowledge, information and belief.


(Signature of Complainant)

SWORN TO AND SUBSCRIBED BEFORE ME ON THIS DAY of 11/6/2002.

NOTARY PUBLIC: 

SIGNATURE NOTARY PUBLIC: 

MY COMMISSION EXPIRES: 2-16-07